

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Mayra Solis

Case No. 19-08108

Chapter 7

All Cases: Moving Creditor MidFirst Bank

Date Case Filed March 22, 2019

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 7: _____ No-Asset Report Filed on _____
X No-Asset Report not Filed, Date of Creditors Meeting April 25, 2019

1. Collateral
 - a. Home 2311 Huron Ter, Waukegan, IL 60087
 - b. Car Year, Make and Model _____
 - c. Other (describe) _____
2. Balance owed as of Petition Date is in excess of \$ 93,000.00
Total of all other liens including collateral \$ 0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in **all** cases) \$ 101,582.00
5. Default
 - a. Pre-Petition Default
Number of months 2 Amount \$ 1,595.38
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months 1 Amount \$ 797.69
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. Lack of Adequate Protection § 362 (d) (1)
 - i. No Insurance _____
 - ii. Taxes Unpaid _____ Amount \$ _____
 - iii. Rapidly depreciating asset _____
 - iv. Other _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) X
 - c. Other "Cause" § 362 (d) (1) _____
 - i. Bad Faith (describe) _____
 - ii. Multiple filings _____
 - iii. Other (describe) _____
 - d. Debtor's Statement of Intention regarding the collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ Other: Debtor will retain collateral and continue to make regular payments

Date: April 18, 2019

/s/ Michael N. Burke
Counsel for Movant